

(Stipulating parties listed on signature page)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION,

No. 07-cv-5944-SC
MDL No. 1917

This Document Relates to:

Electrograph Systems, Inc. et al. v.
Technicolor SA, et al., No. 13-cv-05724;

Alfred H. Siegel, as Trustee of the Circuit
City Stores, Inc. Liquidating Trust v.
Technicolor SA, et al., No. 13-cv-05261;

Best Buy Co., Inc., et al. v. Technicolor SA,
et al., No. 13-cv-05264;

Interbond Corporation of America v.
Technicolor SA, et al., No. 13-cv-05727;

Office Depot, Inc. v. Technicolor SA, et al.,
No. 13-cv-05726;

Costco Wholesale Corporation v.
Technicolor SA, et al., No. 13-cv-05723;

P.C. Richard & Son Long Island
Corporation, et al. v. Technicolor SA, et al.,
No. 31:cv-05725;

Schultze Agency Services, LLC, o/b/o
Tweeter Opco, LLC, et al. v. Technicolor SA,
Ltd., et al., No. 13-cv-05668;

Sears, Roebuck and Co. and Kmart Corp. v.
Technicolor SA, No. 3:13-cv-05262;

Target Corp. v. Technicolor SA, et al., No.
13-cv-05686;

STIPULATION AND ~~[PROPOSED]~~
ORDER EXTENDING THE DEADLINE
TO FILE MOTION TO COMPEL
DIRECT ACTION PLAINTIFFS TO
RESPOND TO CERTAIN OF THE
THOMSON DEFENDANTS'
DISCOVERY REQUESTS

Judge: Hon. Samuel Conti

Tech Data Corp., et al. v. Hitachi, Ltd., et al., No. 13-cv-00157;

Sharp Electronics Corp., et al. v. Hitachi, Ltd., et. al., No. 13-cv-01173.

Direct Action Plaintiffs Electrograph Systems, Inc.; Electrograph Technologies, Corp.; Alfred H. Siegel (as trustee of the Circuit City Stores, Inc. Liquidating Trust); Best Buy Co., Inc.; Best Buy Purchasing LLC; Best Buy Enterprise Services, Inc.; Best Buy Stores, L.P.; BestBuy.com, L.L.C.; Magnolia Hi-Fi, Inc.; Interbond Corporation of America; Office Depot, Inc.; Costco Wholesale Corporation; P.C. Richard & Son Long Island Corporation; ABC Appliance, Inc.; MARTA Cooperative of America, Inc.; Schultze Agency Services, LLC, (on behalf of Tweeter Opco, LLC, and Tweeter Newco, LLC); Sears Roebuck and Co. and Kmart Corp.; and Target Corp.; Sharp Electronics Corporation and Sharp Electronics Manufacturing Company of America, Inc., (collectively, “Sharp”); Tech Data Corporation and Tech Data Product Management, Inc.; (all collectively the “DAPs”) on the one hand, and Thomson S.A. (n.k.a. Technicolor S.A.) and Thomson Consumer Electronics, Inc. (n.k.a. Technicolor USA, Inc.) (collectively the “Thomson Defendants”) on the other (together, the “Parties”) have conferred by and through their counsel and, subject to the Court’s approval, HEREBY STIPULATE AS FOLLOWS:

WHEREAS, on March 21, 2014, the Court entered a scheduling order setting the close of fact discovery for September 5, 2014 (Dkt. No. 2459);

WHEREAS, the deadline to file any motion to compel after the discovery cut-off is September 12, 2014 (L.R. 37-3);

WHEREAS, on August 1, 2014, the Thomson Defendants served discovery requests on all DAPs, including Thomson SA’s Second Set of Requests for Production, seeking, *inter alia*, documents reflecting both formal and informal communications between the DAPs and others regarding their intention to exclude themselves from the Direct Purchaser Plaintiff Class in this litigation (the “Opt-Out Discovery Request”);

1 WHEREAS, on or around September 5, 2014, all DAPs served their responses to the Opt-
2 Out Discovery Request, which responses included objections on various grounds;

3 WHEREAS, on September 9, 2014, the Thomson Defendants sent a meet and confer letter
4 to the DAPs regarding issues with their responses and the Parties have since met and conferred in
5 a conference call and in subsequent correspondence with a *bona fide* intent to continue doing so;

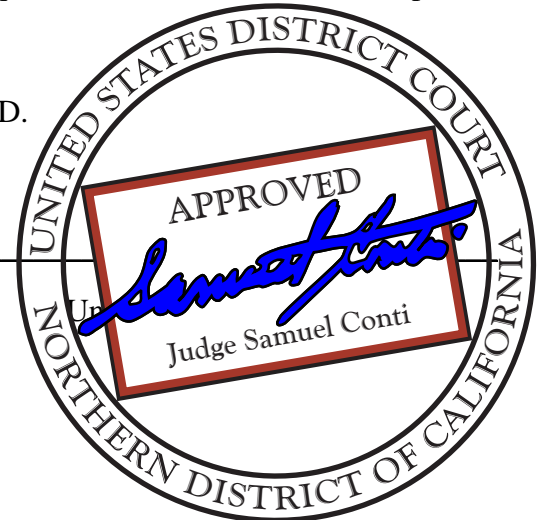
6 WHEREAS, the Thomson Defendants and the DAPs agree to extend the deadline for the
7 Thomson Defendants to file a motion to compel relating to issues specific to the DAPs' responses
8 and objections to the Opt-Out Discovery Request to September 19, 2014;

9 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED** between the
10 undersigned counsel that the Thomson Defendants may file a motion to compel on issues specific
11 to the Opt-Out Discovery Request on or before September 19, 2014.

12 The undersigned parties jointly and respectfully request that the Court enter this stipulation as
13 an order.

14 PURSUANT TO STIPULATION, IT IS SO ORDERED.

15
16 Dated: October 2, 2014



1 Dated: September 12, 2014

FAEGRE BAKER DANIELS LLP

2
3 /s/ Kathy L. Osborn

4 Kathy L. Osborn (*pro hac vice*)
5 Ryan M. Hurley (*pro hac vice*)
6 Faegre Baker Daniels LLP
7 300 N. Meridian Street, Suite 2700
8 Indianapolis, IN 46204
Telephone: (317) 237-0300
Facsimile: (317) 237-1000
kathy.osborn@FaegreBD.com
ryan.hurley@FaegreBD.com

9 Jeffrey S. Roberts (*pro hac vice*)
10 Faegre Baker Daniels LLP
11 3200 Wells Fargo Center
12 1700 Lincoln Street
13 Denver, CO 80203
Telephone: (303) 607-3500
Facsimile: (303) 607-3600
jeff.roberts@FaegreBD.com

14 Stephen M. Judge (*pro hac vice*)
15 Faegre Baker Daniels LLP
16 202 S. Michigan Street, Suite 1400
17 South Bend, IN 46601
Telephone: +1 574-234-4149
Facsimile: +1 574-239-1900
steve.judge@FaegreBd.com

18 Calvin L. Litsey (SBN 289659)
19 Faegre Baker Daniels LLP
20 1950 University Avenue, Suite 450
21 East Palo Alto, CA 94303-2279
Telephone: (650) 324-6700
Facsimile: (650) 324-6701
calvin.litsey@FaegreBD.com

22 *Attorneys for Defendants Thomson SA and Thomson*
23 *Consumer Electronics, Inc.*

/s/ Philip J. Iovieno

Philip J. Iovieno
Anne M. Nardacci
BOIES, SCHILLER & FLEXNER LLP
30 South Pearl St., 11th Floor
Albany, NY 12207
Telephone: (518) 434-0600
Facsimile: (518) 434-0665
piovieno@bsfllp.com
anardacci@bsfllp.com

William Isaacson
Boies, Schiller & Flexner LLP
5301 Wisconsin Ave. NW, Suite 800
Washington, D.C. 20015
Telephone: (202) 237-2727
Facsimile: (202) 237-6131
wisaacson@bsfllp.com

Stuart Singer
Boies, Schiller & Flexner LLP
401 East Las Olas Blvd., Suite 1200
Fort Lauderdale, FL 33301
Telephone: (954) 356-0011
Facsimile: (954) 356-0022
ssinger@bsfllp.com

*Liaison Counsel for Direct Action Plaintiffs and
Tech Data*

/s/ Craig Benson

Kenneth A. Gallo (*pro hac vice*)
Joseph J. Simons (*pro hac vice*)
Craig A. Benson (*pro hac vice*)
PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP
2001 K Street, NW
Washington, DC 20006
Telephone: (202) 223-7300
Facsimile: (202) 223-7420
kgallo@paulweiss.com
jsimons@paulweiss.com
cbenson@paulweiss.com

Stephen E. Taylor (SBN 058452)
Jonathan A. Patchen (SBN 237346)
Taylor & Company Law Offices, LLP
One Ferry Building, Suite 355
San Francisco, California 94111
Telephone: (415) 788-8200
Facsimile: (415) 788-8208
staylor@paulweiss.com

jpatchen@paulweiss.com

*Attorneys for Sharp Electronics Corporation and
Sharp Electronics Manufacturing Company of
America, Inc.*

/s/ David Martinez

Roman M. Silberfeld

David Martinez

Jill S. Casselman

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.

2049 Century Park East, Suite 3400

Los Angeles, CA 90067-3208

Telephone: (310) 552-0130

Facsimile: (310) 229-5800

Email: rmsilberfeld@rkmc.com

dmartinez@rkmc.com

jscasselman@rkmc.com

Elliot S. Kaplan

K. Craig Wildfang

Laura E. Nelson

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.

800 LaSalle Avenue

2800 LaSalle Plaza

Minneapolis, MN 55402

Telephone: (612) 349-8500

Facsimile: (612) 339-4181

Email: eskaplan@rkmc.com

kcwildfang@rkmc.com

lenelson@rkmc.com

*Counsel for Plaintiffs Best Buy Co., Inc., Best Buy
Purchasing LLC, Best Buy Enterprise Services, Inc.,
Best Buy Stores, L.P., BestBuy.com, L.L.C., and
Magnolia Hi-Fi, LLC.*

/s/ David J. Burman

David J. Burman
Cori G. Moore
Eric J. Weiss
Nicholas H. Hesterberg
Steven D. Merriman
PERKINS COIE LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Telephone: (206) 359-8000
Facsimile: (206) 359-9000
Email: DBurman@perkinscoie.com
CGmoore@perkinscoie.com
EWeiss@perkinscoie.com
NHesterberg@perkinscoie.com
SMerriman@perkinscoie.com

Joren S. Bass
PERKINS COIE LLP
Four Embarcadero Center, Suite 2400
San Francisco, CA 94111-4131
Telephone: (415) 344-7120
Facsimile: (415) 344-7320
Email: JBass@perkinscoie.com

Attorneys for Plaintiff Costco Wholesale Corporation

/s/ Scott N. Wagner

Robert W. Turken
Scott N. Wagner
BILZIN SUMBERG BAENA PRICE &
AXELROD LLP
1450 Brickell Ave, Suite 2300
Miami, FL 33131-3456
Telephone: (305) 374-7580
Facsimile: (305) 374-7593
Email: rturken@bilzin.com
swagner@bilzin.com

Stuart Singer
BOIES, SCHILLER & FLEXNER LLP
401 East Las Olas Blvd., Suite 1200
Fort Lauderdale, FL 33301
Telephone: (954) 356-0011
Facsimile: (954) 356-0022
Email: ssinger@bsflp.com

William A. Isaacson
BOIES, SCHILLER & FLEXNER LLP
5301 Wisconsin Ave. NW, Suite 800
Washington, D.C. 20015
Telephone: (202) 237-2727
Facsimile: (202) 237-6131

Email: wisaacson@bsfllp.com

Philip J. Iovieno
Anne M. Nardacci
BOIES, SCHILLER & FLEXNER LLP
30 South Pearl Street, 11th Floor
Albany, NY 12207
Telephone: (518) 434-0600
Facsimile: (518) 434-0665
Email: piovieno@bsfllp.com
anardacci@bsfllp.com

*Attorneys for Plaintiffs Tech Data Corporation and
Tech Data Product Management*

/s/ Lee Godfrey
H. Lee Godfrey
Kenneth S. Marks
Jonathan J. Ross
Johnny W. Carter
David M. Peterson
SUSMAN GODFREY L.L.P.
1000 Louisiana Street, Suite 5100
Houston, TX 77002
Telephone: (713) 651-9366
Facsimile: (713) 654-6666
Email: lgodfrey@susmangodfrey.com
kmarks@susmangodfrey.com
jross@susmangodfrey.com
jcarter@susmangodfrey.com
dpeterson@susmangodfrey.com

Parker C. Folse III
Rachel S. Black
Jordan Connors
SUSMAN GODFREY L.L.P.
1201 Third Avenue, Suite 3800
Seattle, WA 98101-3000
Telephone: (206) 516-3880
Facsimile: (206) 516-3883
Email: pfolse@susmangodfrey.com
rblack@susmangodfrey.com
jconnors@susmangodfrey.com

*Counsel for Plaintiff Alfred H. Siegel, solely in his
capacity as Trustee of the Circuit City Stores, Inc.
Liquidating Trust*

/s/ Jason Murray

Jason C. Murray
CROWELL & MORING LLP
515 South Flower Street, 40th Floor
Los Angeles, CA 90071
Telephone: (213) 443-5582
Facsimile: (213) 622-2690
Email: jmurray@crowell.com

Jerome A. Murphy
Astor H.L. Heaven
CROWELL & MORING LLP
1001 Pennsylvania Avenue, N.W.
Washington, DC 20004
Telephone: (202) 624-2500
Facsimile: (202) 628-5116
Email: jmurphy@crowell.com
aheaven@crowell.com

Counsel for Target Corp..

/s/ Richard Arnold

Richard Alan Arnold
William J. Blechman
Kevin J. Murray
KENNY NACHWALTER, P.A.
201 S. Biscayne Boulevard, Suite 1100
Miami, FL 33131
Telephone: (305) 373-1000
Facsimile: (305) 372-1861
Email: rarnold@knpa.com
wblechman@knpa.com
kmurray@knpa.com

*Counsel for Plaintiff Sears, Roebuck and Co. and
Kmart Corp.*

Pursuant to Local Rule 5-1(i), the filer attests that the concurrence in the filing of this document has been obtained from each of the above signatories.